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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

Case No.: 2:23-cv-00482-RJS

**[PROPOSED] STIPULATED  
TEMPORARY ORDER  
REGARDING LIVING EXPENSES**

Chief Judge Robert J. Shelby

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRTZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

**WHEREAS**, on July 26, 2023, Plaintiff Securities and Exchange Commission (“SEC,” or “Commission”) filed its Complaint in this matter, alleging violations of the registration and antifraud provisions of the federal securities laws by Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt. No. 1.) The Commission’s Complaint does not allege that Defendant Travis Flaherty violated the antifraud provisions of the federal securities laws.

**WHEREAS**, on July 26, 2023, the Commission filed a motion for a temporary restraining order and ancillary relief, including an asset freeze as to Defendants and Relief Defendants. (Dkt. No. 3.)

**WHEREAS**, on July 28, 2023, the Court granted the Commission’s motion and entered a Temporary Restraining Order which, among other things, entered an asset freeze as to Defendants and Relief Defendants (Dkt. No. 9), and provided, *inter alia*, for “an allowance for necessary and reasonable living expenses to be granted only upon good cause shown by application to the Court with notice and an opportunity for the Commission to be heard,” (*id.* § IX).

**WHEREAS**, on August 7, 2023, and thereafter on August 17, 2023, no defendant having filed an opposition to the Temporary Restraining Order, the Court entered renewed Temporary Restraining Orders containing the same provisions as the initial order with respect to the asset freeze. (Dkt. Nos. 33, 78.)

**WHEREAS**, counsel for the Commission and Defendant Travis Flaherty have reached the following agreement as to the scope of the asset freeze and an allowance for living expenses while the Temporary Restraining Order is in place, without prejudice to Defendant Flaherty seeking further modification of such asset freeze or filing an opposition to the Temporary Restraining Order, and jointly provide this proposed agreement for approval by the Court:

1. The Wells Fargo bank account ending in 1671 (the “Wells Fargo Account”) held in the name of Travis and Summer Flaherty shall be unfrozen to pay living expenses and hold going-forward, earned income unconnected to the conduct alleged in the Complaint.

2. Defendant Flaherty may withdraw up to \$7,824 per month—representing the IRS 2023 Allowable Living Expenses National Standards for a family of eight—of previously frozen funds from the Wells Fargo Account until January 31, 2024, for necessary and reasonable living expenses.

8. Defendant Flaherty must provide to counsel to the Commission, without further request or subpoena, the monthly account statements of the Wells Fargo Account, for review and inspection by no later than the 5th of each month this stipulation is in effect. These statements shall be provided to counsel to the Commission by email to Casey R. Fronk (fronkc@sec.gov) and Michael E. Welsh (welshmi@sec.gov).

9. To the extent Defendant Flaherty earns additional, going-forward income (or receives loan proceeds or funds from family members or friends) that he demonstrates, to the satisfaction of counsel for the Commission, is unconnected to the conduct alleged in the Complaint, such income may be used for the payment of necessary and reasonable living expenses and payment of attorney’s fees and defense costs.

Dated: August 25, 2023

**U.S. SECURITIES AND EXCHANGE  
COMMISSION**

/s/ Michael E. Welsh  
MICHAEL E. WELSH  
CASEY R. FRONK  
*Attorneys for Petitioner U.S. Securities and  
Exchange Commission*

Dated: August 25, 2023

**JOSE ABARCA**

/s/ Jose Abarca  
Polsinelli PC  
*Attorney for Defendant Travis Flaherty*

IT IS SO ORDERED this \_\_\_\_ day of August 2023 at \_\_\_\_

\_\_\_\_\_  
ROBERT J. SHELBY  
United States Chief District Judge